

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ROLANDO JESSE DAZA-CORTEZ,

Defendant-Petitioner,

v.

UNITED STATES OF AMERICA,

Plaintiff-Respondent.

NO. C18-1608RAJ  
(CR15-269RAJ)

UNITED STATES' ANSWER TO  
AMENDED PETITION FILED  
UNDER 28 U.S.C. § 2255  
("PETITIONER'S RESPONSE TO  
GOVERNMENT'S RESPONSE")

Exhibit 8

Notes from Prior Counsel Emily Gause

January 23, 2017

Negotiation Phone call with Sarah Vogel and Andy Colosurdo

1/23/2017

Explained our position and our offer

5 year MM, government cap at 84 months. No guns, no Scion, no storage unit, no money laundering.

Gave reasons in the memo – cited to evidence in discovery – summarized Lorraine's report – and compared with other similar leaders of DTOs in related cases. Compared with Mendoza-Garcia.

Don't need an email with explanation.

Send the email with the bullet points and endorsed offer – they will share with their supervisor.

She doesn't think the 84 month is horribly unreasonable. But the lack of plea to a gun count and money laundering may be a non-starter.